

WILMERHALE

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VIA ECF

The Honorable Colleen McMahon  
United States District Court  
for the Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Michael Carroll, et al.*, No. 19-cr-545 (CM)

Dear Chief Judge McMahon:

The defendants in the above-captioned case write to request an adjournment of trial in this case until September 20, 2021. The government consents to our request.

This case is currently scheduled for trial in May 2021, pending approval from the Court's trial panel. In light of the challenges that the ongoing COVID-19 pandemic presents to defendants' ability to prepare their defense to the complicated accounting fraud allegations in this case, we ask that the Court adjourn the trial date until September 20, 2021. The parties agree to exclude time under the Speedy Trial Act until September 20, in order to, among other things, allow the defense to prepare given COVID-19.

Respectfully submitted,

/s/ Peter G. Neiman

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MEMO ENDORSED

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1/25/2021  
I will request a  
trial date no earlier  
than September 20 -  
probably a fourth  
quarter date if  
operations are  
not back to normal.  
I cannot presently  
give you a precise date  
1/25/2021